

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Peter Allan, Russell John Hatton, Michael Benson, Steven Hawkins, Russell Lynn Norton, Danny Stone, Patrick Otten, Ryan White, Kenneth Delaney, David Hamilton, Kenneth Daywitt, Dennis White, Maikijah Hakeem, Daniel A. Wilson, and Joseph Franciosa Thomas,

Plaintiffs,

vs.

Minnesota Department of Human Services, Jodi Harpstead in her official capacity as Commissioner of Department of Human Services, Marshall Smith, in his official capacity as Chief Executive Director of Direct Care and Treatment for the Minnesota Sex Offender Program, Nancy Johnston, in her official capacity as the Minnesota Sex Offender Program Executive Director, and Kevin Moser, in his official capacity as the Moose Lake Facility Director for the Minnesota Sex Offender Program,

Defendants.

Case No. 20-cv-01980 -SRN-TNL

**STIPULATION FOR PARTIAL  
DISMISSAL WITH PREJUDICE**

WHEREAS, Count III of the above-entitled action has been fully compromised and settled,  
NOW THEREFORE, it is hereby stipulated and agreed, by and between Plaintiffs and Defendants, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A), that Count III of this action is dismissed with prejudice, and without any fees or costs to any party.

*[signatures on next page]*

Dated: March 4, <sup>2022</sup>~~2021~~

KEITH ELLISON  
Attorney General  
State of Minnesota



BRANDON BOESE  
Assistant Attorney General  
Atty. Reg. No. 0396385  
445 Minnesota Street, Suite 1400  
St. Paul, Minnesota 55101-2131  
(651) 757-1414 (Voice)  
(651) 282-5832 (Fax)  
brandon.boese@ag.state.mn.us

*Attorney For Defendants*

Dated: 3.4, <sup>2022</sup>~~2021~~

MOHRMAN, KAARDAL & ERICKSON, P.A.



ERICK G. KAARDAL (#229647)  
150 South Fifth Street, Suite 3100  
Minneapolis, MN 55402  
Telephone: 612-341-1074  
Facsimile: 612-341-1076  
Email: kaardal@mklaw.com

*Attorney for Plaintiffs*